12/3/01

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December 3, 2001

Tom Turner
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U.S. EPA – Region V
Office of Regional Counsel (C-14J)
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Chicago, IL 63604

CARL A. WATTENBERG, JR.

of Connect

EPA Region 5 Records Ctr.

RE:

Express Valet, Inc./Clayton Chemical Site, Sauget, Illinois

Our File: 01-2755

Dear Mr. Turner:

It was a pleasure speaking with you today; thank you for taking my call. Please permit this letter to confirm this Firm's representation of Express Valet, Inc., d/b/a Lafayette Square Cleaners. Please direct all future correspondence concerning this matter to the undersigned.

I have spoken with my client several times today concerning this matter, and he has directed me to respond to your letter ("PRP Letter"), which he received on or about December 3, 2001. Accordingly, without admitting liability in connection with your aforementioned PRP Letter, Mr. Michael Mueller and Express Valet, Inc. are pleased to provide the following response.

First, Express Valet has not done business under the name of Lafayette Square Cleaners since early 1993. It is quite possible that the PRP Letter is in error and that the real PRP is another entity altogether. Your confirmation that you indeed have the correct party would be appreciated.

Second, if it is determined that Express Valet, Inc., either directly or through a d/b/a, has some liability for actions described in the PRP Letter, those actions and any damages resulting therefrom are de minimis. Accordingly, please forward any and all records, including Illinois EPA records, purporting to show liability on the part of Express Valet, Inc. to the attention of the undersigned for evaluation.

Due to the foregoing, neither myself nor my client have any plans of attending the meeting in Chicago on December 11, 2001; however, we wish to be kept informed regarding the status of this matter. Please forward any information concerning this matter to the undersigned at your earliest

Tom Turner December 3, 2001 Page Two

convenience. In the meantime, we have initiated contact with other St. Louis area cleaners for purposes of streamlining this process. I will be in touch regarding the eventual outcome of these efforts.

Should you have any further questions or comments regarding the status of the above matter, please feel free to contact me.

Very truly yours,

KODNER, WATKINS, MUCHNICK & DUNNE, L.C.

Joseph B. Kloecker, Jr.